## IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF ALABAMA

IN RE: Thomas Newman

BR: 16-32094

## **AFFIDAVIT**

STATE OF FLORIDA COUNTY OF ESCAMBIA

- I, Thomas Alexander Taylor being duly sworn, do hereby depose and say:
- 1. That I am a duly licensed attorney and member of the Florida State Bar Association and I am a member of the firm of Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor P.A. and I am authorized to act on their behalf.
- 2. The Trustee herein seeks to employ my firm for this case and the firm is eligible for such employment under the Bankruptcy Code for the purpose set forth in the application.
- 3. The firm has previously represented the debtor in the matter which the Trustee seeks to pursue. The firm was not the attorney for the debtor in the filing of the petition in bankruptcy.
- 4. We have had experience in the area of civil litigation which is involved in this case and are qualified and willing to represent the Trustee in this matter.
- 5. The firm will continue to represent the debtor as co-plaintiff with the Trustee to the extent that the debtor may have an interest in any exempt amount and/or surplus generated as a result of this litigation. I understand that the Trustee will retain control over presentation of settlement offers to the Court and this firm will not be involved in resolving any dispute between the Trustee and the debtor as to any proposed settlement.
- 6. Other than as set forth in paragraph 3 hereinabove, I do not have any connection with the debtor(s), creditors, any other party in interest, their respective attorneys or accountants, the U.S. Bankruptcy Administrator or any person employed in the office of the U.S. Bankruptcy Administrator.
- 7. The firm has agreed to share compensation with the firm of Shapiro Legal Group, PLLC. The allocation of fees is 90% to the firm of Levin Papantonio and 10% to the firm of Shapiro Legal Group, PLLC.

T. Alexander Taylor

Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P. A.

316 South Baylen Street, Suite 400

Pensacola, FL 32502

SWORN TO and SUBSCRIBED before me this <u>QQ Nd</u> day of <u>FEBRUARY</u> 2018.

NOTARY PUBLIC

My Commission Expires 3.25.20